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Defendants’ Subpoena to Mr. Gary Gensler, June 14 2024 (the “Subpoena”) (Ex. A)	Defendants’ Request for Production of Documents to SEC, April 23, 2024 (“RFPs”) (Ex. B)	Defendants’ Subpoena to MIT, June 4, 2023 (“MIT Subpoena”) (Ex. C)
<p><u>Request No. 1</u></p> <p>All Documents and Communications concerning Coinbase, the Coinbase Platform, the Named Digital Assets, the Named Coinbase Services, or the subject matter of the Investigation or the Action, including all Communications with any Person or entity not party to this Action concerning the foregoing.</p>	<p><u>Request No. 2</u></p> <p>All Documents and Communications concerning the Coinbase Platform, the Named Digital Assets, the Named Coinbase Services, or the subject matter of the Investigation or the Action, including all Communications with any Person or entity not party to this Action concerning the foregoing and any formal, informal, or voluntary requests by you for documents or information from any Person concerning the Coinbase Platform, the Named Digital Assets, the Named Coinbase Services, all Documents or Communications you received in response to such formal, informal, or voluntary requests, and all analyses (including but not limited to any regression and correlation, or event study analysis) whether done by you or on your behalf relating to the Coinbase Platform, any of the Named Digital Assets or Named Coinbase Services, the market performance of any of the Named Digital Assets relative to other Digital Assets or to public statements by Coinbase and/or the alleged issuers or promoters of such Named Digital Assets, and the size and value of sales of any of the Named Digital Assets over time.</p>	<p><u>Request No. 12</u></p> <p>All Documents and Communications concerning Coinbase, the Coinbase Platform, or the Named Coinbase Services.</p>

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<u>Request No. 2</u> Documents and/or Communications sufficient to establish when you first learned of the Coinbase Platform, the Named Digital Assets, and the Named Coinbase Services, and when you first learned that each of the Named Digital Assets had been listed or was planned to be listed on the Coinbase Platform, without limitation as to the applicable time period.	<u>Request No. 3</u> Documents and/or Communications sufficient to establish when the SEC first learned of the Coinbase Platform, the Named Digital Assets, and the Named Coinbase Services, and when the SEC first learned that each of the Named Digital Assets had been listed or was planned to be listed on the Coinbase Platform, without limitation as to the applicable time period.	
<u>Request No. 3</u> All Communications with, and Documents concerning Communications with, third parties (including any Government Entity) concerning the application of federal laws, regulations, or rules (including, but not limited to, the Securities Act of 1933 and the Securities Exchange Act of 1934) to Digital Assets, Digital Asset Platforms, or Staking as a Service.	<u>Request No. 4</u> All Communications with, and Documents concerning Communications with, third parties (including any Government Entity) concerning the application of federal laws, regulations, or rules (including, but not limited to, the Securities Act of 1933 and the Securities Exchange Act of 1934) to the Coinbase Platform, the Named Digital Assets, or the Named Coinbase Services.	<u>Request No. 3</u> All Communications and Documents concerning the application of federal laws, regulations, or rules (including, but not limited to, the Securities Act of 1933 and the Securities Exchange Act of 1934) to Digital Assets, Digital Asset Platforms, Staking, or Staking as a Service, including whether and to what extent any particular Digital Asset (<i>e.g.</i> , FIL, DASH, ETH, XRP, DAO, SOL), or transaction in any particular Digital Asset, is a “security” under the Securities Act of 1933 and/or the Securities Exchange Act of 1934.

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<u>Request No. 4</u> All Communications and Documents concerning any investigation by a Government Entity concerning Digital Assets, Digital Asset Platforms, or Staking as a Service.	<u>Request No. 5</u> All Communications with, and Documents concerning Communications with, third parties (including any Government Entity) concerning any investigation by a Government Entity concerning Coinbase, the Coinbase Platform, any of the Named Digital Assets, or any of the Named Coinbase Services.	<u>Request No. 11</u> All Documents and Communications concerning any investigation or litigation by a Government Entity concerning Digital Assets, Digital Asset Platforms, or Staking as a Service.

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<p><u>Request No. 5</u></p> <p>All Communications with, and Documents concerning Communications with, the Financial Industry Regulatory Authority (FINRA) or any Government Entity, including the SEC, or the CFTC, relating to the allegations in the Complaint, the Investigation, Digital Assets, Digital Asset Platforms, or Staking as a Service.</p>	<p><u>Request No. 6</u></p> <p>All Communications with, and Documents concerning Communications with, any Government Entity, including the CFTC, or with the Financial Industry Regulatory Authority (FINRA), relating to the allegations in the Complaint, the Investigation, Staking as a Service, Digital Assets, or Digital Asset Platforms, including but not limited to:</p> <ol style="list-style-type: none"> a. Any factual Documents prepared for or by the Commission, any Commissioner, and/or any Commission Staff or otherwise in the Commission Staff’s custody or control, relating to the regulatory and/or enforcement authorities of the SEC and/or another Government Entity, including the scope of regulatory and/or enforcement authorities as between the SEC and another Government Entity or potential or proposed legislation relating to the regulatory and/or enforcement authorities of the SEC and/or another Government Entity; and 	<p><u>Request No. 7</u></p> <p>All Communication and Documents concerning the regulatory authority of the Financial Industry Regulatory Authority (FINRA) or any Government Entity, including the SEC or CFTC, with respect to Digital Assets, Digital Asset Platforms, Staking, or Staking as a Service.</p>

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	b. Any external Communications by the Commission, any Commissioner, and/or any Commission Staff, whether formal or informal, relating to the regulatory and/or enforcement authorities of the SEC and/or another Government Entity, including the scope of regulatory and/or enforcement authorities as between the SEC and another Government Entity or potential or proposed legislation relating to the regulatory and/or enforcement authorities of the SEC and/or another Government Entity.	
<u>Request No. 6</u> All Communications with, and Documents concerning Communications with, journalists or other employees or affiliates of news or media organizations concerning Coinbase, this Action, the Investigation, Digital Assets, Digital Asset Platforms, or Staking as a Service.	<u>Request No. 7</u> All Communications with, and Documents concerning Communications with, journalists or other employees or affiliates of news or media organizations concerning Coinbase, this Action, the Investigation, the Coinbase Platform, Digital Asset Platforms, any of the Named Digital Assets, or any of the Named Coinbase Services.	

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<u>Request No. 7</u> All Communications with, and Documents concerning Communications with, any alleged developers of, alleged issuers of, or Persons otherwise affiliated with any Digital Assets or their associated blockchain networks, including any Documents or information provided to you by any alleged developers of, alleged issuers of, or Persons otherwise affiliated with any Digital Assets, their affiliated blockchain networks, or their counsel.	<u>Request No. 8</u> All Communications with, and Documents concerning Communications with, any alleged developers of, alleged issuers of, or Persons otherwise affiliated with any of the Named Digital Assets or their associated blockchain networks, including any Documents or information provided to you by any alleged developers of, alleged issuers of, or Persons otherwise affiliated with any of the Named Digital Assets, their affiliated blockchain networks, or their counsel.	
<u>Request No. 8</u> All Documents and Communications concerning any discussions, instructions, advice, inquiries or other Communications between you and any Person concerning that Person's actual, planned, or potential business or other relationship with Coinbase or with a developer of or Person otherwise affiliated with Digital Assets, Digital Asset Platforms, or Staking as a Service.	<u>Request No. 9</u> All Documents and Communications concerning any discussions, instructions, advice, inquiries, or other Communications between the SEC and any Person concerning that Person's actual, planned, or potential business or other relationship with Coinbase.	<u>Request No. 13</u> All Documents and Communications concerning any discussions, instructions, advice, inquiries or other Communications between Professor Gensler and any Person concerning that Person's actual, planned, or potential business or other relationship with a developer of or Person otherwise affiliated with Digital Assets, Digital Asset Platforms, or Staking as a Service provider.
<u>Request No. 9</u> All Communications with, and Documents concerning Communications with, Prometheus, Inc., Martin Kaplan, Aaron Kaplan, or Benjamin Kaplan; Securitize, Inc.; Securitize LLC; or Securitize Markets, LLC.	<u>Request No. 10</u> Without limitation as to time period, all Communications with, and Documents concerning Communications with: Prometheus, Inc., Martin Kaplan, Aaron Kaplan, or Benjamin Kaplan; Securitize, Inc.; Securitize LLC; or Securitize Markets, LLC.	

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<u>Request No. 10</u> All Communications with, and Documents concerning Communications with, IEX Group, Inc. or Investors’ Exchange LLC concerning Coinbase, Digital Assets, or Digital Asset Platforms.	<u>Request No. 11</u> All Communications with, and Documents concerning Communications with, IEX Group, Inc. or Investors’ Exchange LLC concerning Coinbase, Digital Assets, or Digital Asset Platforms.	
<u>Request No. 11</u> All Communications with, and Documents concerning Communications with, any Person concerning (i) any actual, planned, or potential registration by that Person as an exchange, broker, dealer, clearing agency, alternative trading system, or custodian that would or could facilitate the offer, sale, or custody of Digital Assets or any product or service relating to Digital Assets, including but not limited to the means or viability of such registration; or (ii) the registration with the SEC of any exchange-traded product that holds or references Digital Assets.	<u>Request No. 12</u> Without limitation as to time period, all Communications with, and Documents concerning Communications with, any Person concerning: (i) any actual, planned, or potential registration by that Person as an exchange, broker, dealer, clearing agency, alternative trading system, or custodian that would or could facilitate the offer, sale, or custody of Digital Assets or any product or service relating to Digital Assets, including but not limited to the requirements and process for or viability of such registration; or (ii) the registration with the SEC of any exchange- traded product that holds or references Digital Assets. For the purposes of this Request, “Person” includes but is not limited to BlackRock, Inc., Valkyrie Investments Inc., Valkyrie Digital Assets LLC, and Valkyrie Funds LLC.	

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<p><u>Request No. 12</u></p> <p>All Documents and Communications concerning (i) <i>Report of Investigation Pursuant to Section 21(a) of the Securities Exchange Act of 1934: The DAO</i>, Exchange Act Release No. 81207 (July 25, 2017), (ii) the June 14, 2018 speech by former SEC Director of the Division of Corporation Finance William Hinman titled "Digital Asset Transactions: When Howey Met Gary (Plastic)" ("Hinman Speech"), or (iii) FinHub's April 2019 "Framework for 'Investment Contract' Analysis of Digital Assets."</p>	<p><u>Request No. 13</u></p> <p>All Documents and Communications concerning (i) the June 14, 2018 speech by former SEC Director of the Division of Corporation Finance William Hinman titled "Digital Asset Transactions: When Howey Met Gary (Plastic)" ("Hinman Speech"), (ii) FinHub's April 2019 "Framework for 'Investment Contract' Analysis of Digital Assets," and (iii) <i>Report of Investigation Pursuant to Section 21(a) of the Securities Exchange Act of 1934: The DAO</i>, Exchange Act Release No. 81207 (July 25, 2017), including but not limited to all Communications with any blockchain network or representative thereof and all Documents and Communications, including internal Communications, analyses, and other materials, that were prepared, reviewed, or relied upon by any current or former SEC Commissioner, Division Director, or Staff member in reaching the conclusions and observations reflected in these statements, including drafts of the statements and analyses prepared or commented upon by SEC Staff.</p>	<p><u>Request No. 8</u></p> <p>All Documents and Communications concerning (i) <i>Report of Investigation Pursuant to Section 21(a) of the Securities Exchange Act of 1934: The DAO</i>, Exchange Act Release No. 81207 (July 25, 2017), (ii) the June 14, 2018 speech by former SEC Director of the Division of Corporation Finance William Hinman titled "Digital Asset Transactions: When Howey Met Gary (Plastic)" ("Hinman Speech"), or (iii) FinHub's April 2019 "Framework for 'Investment Contract' Analysis of Digital Assets."</p>

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<p><u>Request No. 13</u></p> <p>All Documents and Communications concerning any public statements by FINRA or any Government Agency, including but not limited to the SEC and CFTC, concerning Digital Assets, Digital Asset Platforms, Staking, or Staking as a Service.</p>	<p><u>Request No. 14</u></p> <p>All Documents and Communications concerning any public statements by the Commission or any SEC Division, Commissioner, or Staff member concerning the Named Digital Assets or Digital Asset Platforms, including but not limited to any internal or external Communications concerning such public statements and any analyses or other materials that were prepared or relied upon in reaching the conclusions and observations reflected in such public statements, including all Documents and Communications reflecting the Persons involved in such Communications or analyses.</p> <p><i>See also</i> Request No. 6 above.</p>	<p><u>Request No. 9</u></p> <p>All Documents and Communications concerning any public statements by any Government Entity, including but not limited to the SEC and any SEC Division, Commissioner, or Staff member, concerning Digital Assets, Digital Asset Platforms, Staking, or Staking as a Service.</p>
<p><u>Request No. 14</u></p> <p>All Documents and Communications concerning whether Digital Assets or transactions in Digital Assets are “investment contract[s]” within the meaning of the Securities Act of 1933 or the Securities Exchange Act of 1934, including Documents and Communications concerning the application of <i>SEC v. W.J. Howey Co.</i>, 328 U.S. 293 (1946), to Digital Assets or transactions in Digital Assets.</p>	<p><u>Request No. 15</u></p> <p>All Documents and Communications concerning whether Digital Assets or transactions in Digital Assets are “investment contract[s]” within the meaning of the Securities Act of 1933 or the Securities Exchange Act of 1934, including Documents and Communications concerning the application of <i>SEC v. W.J. Howey Co.</i>, 328 U.S. 293 (1946), to Digital Assets or transactions in Digital Assets.</p>	<p><u>Request No. 4</u></p> <p>All Documents and Communications concerning whether Digital Assets or transactions in Digital Assets are “investment contract[s]” within the meaning of the Securities Act of 1933 or the Securities Exchange Act of 1934, including Documents and Communications concerning the application of <i>SEC v. W.J. Howey Co.</i>, 328 U.S. 293 (1946), to Digital Assets or transactions in Digital Assets.</p>

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<u>Request No. 15</u> All Documents and Communications concerning (i) the role of a Digital Asset’s ecosystem in the application of the federal securities laws, including but not limited to determining whether transactions in an asset constitute transactions in investment contracts or other securities or (ii) the ecosystems of the Named Digital Assets, including, but not limited to, the components of such ecosystems, the identities of the alleged developers, issuers, and promoters affiliated with such ecosystems.	<u>Request No. 16</u> All Documents and Communications concerning (i) the role of a Digital Asset’s ecosystem in the application of the federal securities laws to that asset, including but not limited to determining whether transactions in an asset constitute transactions in investment contracts or other securities; or (ii) the ecosystems of the Named Digital Assets, including but not limited to the components of such ecosystems, the identities of the alleged developers, issuers, and promoters affiliated with such ecosystems, and any decentralized applications or business platforms related to such ecosystems.	<u>Request No. 5</u> All Documents and Communications concerning (i) the role of a Digital Asset’s ecosystem in the application of the federal securities laws, including but not limited to determining whether transactions in an asset constitute transactions in investment contracts or other securities or (ii) the ecosystems of the Named Digital Assets, including, but not limited to, the components of such ecosystems, the identities of the alleged developers, issuers, and promoters affiliated with such ecosystems.
<u>Request No. 16</u> All Documents and Communications relating to the SEC’s assertion during Oral Argument that when someone “purchases tokens like [the Named Digital Assets], like these 13 examples . . . they are investing into the network behind it”—that is, “the ecosystem.” <i>See</i> Jan. 17, 2024 Hr’g Tr. at 21:20-22:5; <i>see also id.</i> at 57:17-21.	<u>Request No. 17</u> All Documents and Communications relating to your assertion during Oral Argument that when someone “purchases tokens like [the Named Digital Assets], like these 13 examples . . . they are investing into the network behind it”—that is, “the ecosystem.” <i>See</i> Jan. 17, 2024 Hr’g Tr. at 21:20-22:5; <i>see also id.</i> at 57:17-21.	
<u>Request No. 17</u> All Documents and Communications relating to Bitcoin’s ecosystem or lack thereof.	<u>Request No. 18</u> All Documents and Communications relating to (i) Bitcoin’s ecosystem; or (ii) your assertion during Oral Argument that “there’s no ecosystem behind” Bitcoin. <i>See</i> Jan. 17, 2024 Hr’g Tr. at 30:7-15.	<u>Request No. 6</u> All Documents and Communications relating to Bitcoin’s ecosystem or lack thereof.

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<u>Request No. 18</u> All Documents and Communications concerning the size, value, growth, or importance of the Digital Asset industry or Digital Asset Platforms.	<u>Request No. 19</u> All Documents and Communications concerning the size, value, growth, or importance of the Digital Asset industry or Digital Asset Platforms.	<u>Request No. 10</u> All Documents and Communications concerning the size, value, growth, or importance of the Digital Asset industry or Digital Asset Platforms.
<u>Request No. 19</u> All Documents and Communications concerning potential or proposed legislation relating to the regulatory and/or enforcement authorities of the SEC and/or another Government Entity with respect to Digital Assets or Digital Asset Platforms.	<u>Request No. 22</u> All Documents and Communications concerning potential or proposed legislation relating to the regulatory and/or enforcement authorities of the SEC and/or another Government Entity with respect to Digital Assets or Digital Asset Platforms.	
<u>Request No. 20</u> All Documents and Communications concerning any meeting or call involving one or more Commissioner concerning Coinbase, the Coinbase Platform or any of the Named Digital Assets or Named Coinbase Services, including a list of the attendees of any such meeting or call.	<u>Request No. 23</u> All Documents and Communications concerning any meeting or call involving one or more Commissioner concerning Coinbase, the Coinbase Platform, or any of the Named Digital Assets or Named Coinbase Services, including a list of the attendees of any such meeting or call.	

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<p><u>Request No. 21</u></p> <p>All Documents and Communications concerning the following litigation matters:</p> <ul style="list-style-type: none"> a. <i>SEC v. Kik Interactive Inc.</i>, Case No. 19-cv-5244 (S.D.N.Y.); b. <i>SEC v. Telegram Grp. Inc. and TON Issuer Inc.</i>, Case No. 19-cv-9439 (S.D.N.Y.); c. <i>SEC v. Ripple Labs, Inc. et al.</i>, Case No. 20-cv-10832 (S.D.N.Y.); d. <i>SEC v. LBRY, Inc.</i>, Case No. 21-cv-260 (D.N.H.); e. <i>SEC v. Wabi et al.</i>, Case No. 2:22-cv-1009 (W.D. Wash.); f. <i>SEC v. Binance Holdings Ltd. et al.</i>, Case No. 23-cv-1599 (D.D.C.); g. <i>SEC v. Bittrex, Inc. et al.</i>, Case No. 23-cv-580 (W.D. Wash.); h. <i>SEC v. Genesis Global Capital, LLC and Gemini Tr. Co., LLC</i>, Case No. 23-cv-287 (S.D.N.Y.); i. <i>SEC v. Terraform Labs PTE Ltd. and Kwon</i>, Case No. 23-cv-1346 (S.D.N.Y.); j. <i>SEC v. Payward, Inc. and Payward Ventures, Inc.</i>, Case No. 23-cv-6003 (N.D. Cal.); and k. <i>SEC v. Payward Ventures, Inc. (D/B/A Kraken) and Payward Trading, Ltd. (D/B/A Kraken)</i>, Case No. 23-cv-588 (N.D. Cal.). 	<p><u>Request No. 26</u></p> <p>To the extent such Documents and Communications concern any Communications, analyses, or other materials regarding Coinbase, any of the Named Digital Assets, or any of the Named Coinbase Services, your investigative files in connection with any investigations by the Commission or Commission Staff relating to the following litigation matters and all Documents and Communications produced to or by the Commission in discovery in the following litigation matters:</p> <ul style="list-style-type: none"> a. <i>SEC v. Kik Interactive Inc.</i>, Case No. 19-cv-5244 (S.D.N.Y.); b. <i>SEC v. Telegram Grp. Inc. and TON Issuer Inc.</i>, Case No. 19-cv-9439 (S.D.N.Y.); c. <i>SEC v. Ripple Labs, Inc. et al.</i>, Case No. 20-cv-10832 (S.D.N.Y.); d. <i>SEC v. LBRY, Inc.</i>, Case No. 21-cv-260 (D.N.H.); e. <i>SEC v. Wabi et al.</i>, Case No. 2:22-cv-1009 (W.D. Wash.); f. <i>SEC v. Binance Holdings Ltd. et al.</i>, Case No. 23-cv-1599 (D.D.C.); g. <i>SEC v. Bittrex, Inc. et al.</i>, Case No. 23-cv-580 (W.D. Wash.); h. <i>SEC v. Genesis Global Capital, LLC and Gemini Tr. Co., LLC</i>, Case No. 23-cv-287 (S.D.N.Y.); 	

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	i. <i>SEC v. Terraform Labs PTE Ltd. and Kwon</i> , Case No. 23-cv-1346 (S.D.N.Y.); j. <i>SEC v. Payward, Inc. and Payward Ventures, Inc.</i> , Case No. 23-cv-6003 (N.D. Cal.); and k. <i>SEC v. Payward Ventures, Inc. (D/B/A Kraken) and Payward Trading, Ltd. (D/B/A Kraken)</i> , Case No. 23-cv-588 (N.D. Cal.).	
<u>Request No. 22</u> All Documents and Communications concerning Coinbase’s direct public offering or registration statement on Form S-1 (including any drafts of such registration statement), including but not limited to Documents and Communications concerning the application or potential application of the federal securities laws to Coinbase’s business or operations.	<u>Request No. 27</u> All Documents and Communications concerning Coinbase’s direct public offering or registration statement on Form S-1 (including any drafts of such registration statement), including but not limited to Documents and Communications concerning the application or potential application of the federal securities laws to Coinbase’s business or operations.	

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<p><u>Request No. 23</u></p> <p>All Documents and Communications concerning your public remarks about Digital Assets, Digital Asset Platforms, and Staking as a Service, without limitation as to the applicable time period, including but not limited to:</p> <ul style="list-style-type: none"> a. Your May 6, 2021 testimony before the United States House Committee on Financial Services; b. Your May 7, 2021 appearance on CNBC; c. Your May 26, 2021 testimony before the United States House Subcommittee on Financial Services and General Government; d. Your August 3, 2021 remarks before the Aspen Security Forum; e. Your September 21, 2021 interview with the <i>Washington Post</i>; f. Your October 5, 2021 testimony before the United States House Committee on Financial Services; g. Your August 19, 2022 opinion piece published by the <i>Wall Street Journal</i>, titled "The SEC Treats Crypto Like the Rest of the Capital Markets"; h. Your December 7, 2022 interview with Yahoo! Finance; 	<p><u>Request No. 28</u></p> <p>All Documents and Communications concerning SEC Chair Gary Gensler's public remarks about Digital Assets, Digital Asset Platforms, and Staking as a Service, without limitation as to the applicable time period, including but not limited to:</p> <ul style="list-style-type: none"> a. Chair Gensler's May 6, 2021 testimony before the United States House Committee on Financial Services; b. Chair Gensler's May 7, 2021 appearance on CNBC; c. Chair Gensler's May 26, 2021 testimony before the United States House Subcommittee on Financial Services and General Government; d. Chair Gensler's August 3, 2021 remarks before the Aspen Security Forum; e. Chair Gensler's September 21, 2021 interview with the <i>Washington Post</i>; f. Chair Gensler's October 5, 2021 testimony before the United States House Committee on Financial Services; g. Chair Gensler's August 19, 2022 opinion piece published by the <i>Wall Street Journal</i>, titled "The SEC Treats Crypto Like the Rest of the Capital Markets"; h. Chair Gensler's December 7, 2022 interview with Yahoo! Finance; 	

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<p>i. Your interview with Ankush Khardori, as reported in <i>Intelligencer’s</i> February 23, 2023 article, “Can Gary Gensler Survive Crypto Winter? D.C.’s Top Financial Cop on Bankman-Fried Blowback”;</p> <p>j. Your interview with CNBC’s <i>Squawk Box</i>, as reported in CNBC’s February 10, 2023 article, “SEC’s Gary Gensler on Kraken Staking Settlement: Other Crypto Platforms Should take Note of This”;</p> <p>k. Your March 29, 2023 testimony before the United States House Appropriations Subcommittee on Financial Services and General Government;</p> <p>l. Your statements regarding Digital Assets during “Office Hours with Gary Gensler” including but not limited to the episodes from August 16, 2021, July 28, 2022, August 4, 2022, October 3, 2022, February 9, 2023, and April 27, 2023;</p> <p>m. Your April 18, 2023 testimony before the United States House Committee on Financial Services;</p> <p>n. Your interview with CNBC’s <i>Squawk Box</i>, as reported in CNBC’s June 6, 2023 article, “SEC Chair Gensler doubts the need for more digital currency”;</p>	<p>i. Chair Gensler’s interview with Ankush Khardori, as reported in <i>Intelligencer’s</i> February 23, 2023 article, “Can Gary Gensler Survive Crypto Winter? D.C.’s Top Financial Cop on Bankman-Fried Blowback”;</p> <p>j. Chair Gensler’s interview with CNBC’s <i>Squawk Box</i>, as reported in CNBC’s February 10, 2023 article, “SEC’s Gary Gensler on Kraken Staking Settlement: Other Crypto Platforms Should take Note of This”;</p> <p>k. Chair Gensler’s March 29, 2023 testimony before the United States House Appropriations Subcommittee on Financial Services and General Government;</p> <p>l. Chair Gensler’s statements regarding Digital Assets during “Office Hours with Gary Gensler” including but not limited to the episodes from August 16, 2021, July 28, 2022, August 4, 2022, October 3, 2022, February 9, 2023, and April 27, 2023;</p> <p>m. Chair Gensler’s April 18, 2023 testimony before the United States House Committee on Financial Services;</p> <p>n. Chair Gensler’s interview with CNBC’s <i>Squawk Box</i>, as reported in CNBC’s June 6, 2023 article, “SEC Chair Gensler doubts the need for more digital currency”;</p>	

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Defendants’ Subpoena to Mr. Gary Gensler, June 14 2024 (the “Subpoena”) (Ex. A)	Defendants’ Request for Production of Documents to SEC, April 23, 2024 (“RFPs”) (Ex. B)	Defendants’ Subpoena to MIT, June 4, 2023 (“MIT Subpoena”) (Ex. C)
<p>o. Your interview with the <i>Wall Street Journal</i>, as reported in the June 8, 2023 article, “SEC’s Gary Gensler Had Crypto in His Sights for Years. Now He’s Suing Binance and Coinbase.”;</p> <p>p. Your June 8, 2023 remarks before the Piper Sandler Global Exchange & Fintech Conference;</p> <p>q. Your interview with the <i>Wall Street Journal</i>, as broadcast in the June 14, 2023 podcast episode, “SEC Chair Gary Gensler on His Crypto Crackdown”;</p> <p>r. Your September 12, 2023 testimony before the United States Senate Committee on Banking, Housing, and Urban Affairs;</p> <p>s. Your September 27, 2023 testimony before the United States House Committee on Financial Services; and</p> <p>t. Your statements concerning Digital Assets or Digital Asset Platforms made prior to your tenure as SEC Chair.</p>	<p>o. Chair Gensler’s interview with the <i>Wall Street Journal</i>, as reported in the June 8, 2023 article, “SEC’s Gary Gensler Had Crypto in His Sights for Years. Now He’s Suing Binance and Coinbase.”;</p> <p>p. Chair Gensler’s June 8, 2023 remarks before the Piper Sandler Global Exchange & Fintech Conference;</p> <p>q. Chair Gensler’s interview with the <i>Wall Street Journal</i>, as broadcast in the June 14, 2023 podcast episode, “SEC Chair Gary Gensler on His Crypto Crackdown”;</p> <p>r. Chair Gensler’s September 12, 2023 testimony before the United States Senate Committee on Banking, Housing, and Urban Affairs;</p> <p>s. Chair Gensler’s September 27, 2023 testimony before the United States House Committee on Financial Services; and</p> <p>t. Chair Gensler’s statements concerning Digital Assets or Digital Asset Platforms made prior to his tenure as SEC Chair.</p>	

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Defendants’ Subpoena to Mr. Gary Gensler, June 14 2024 (the “Subpoena”) (Ex. A)	Defendants’ Request for Production of Documents to SEC, April 23, 2024 (“RFPs”) (Ex. B)	Defendants’ Subpoena to MIT, June 4, 2023 (“MIT Subpoena”) (Ex. C)
<p><u>Request No. 24</u></p> <p>All Documents and Communications concerning the Petition for Rulemaking submitted by Coinbase on July 21, 2022, any comment letters submitted by Coinbase concerning its Petition for Rulemaking, or the Commission’s Order denying Coinbase’s Petition for Rulemaking issued on December 15, 2023, including any Communications with any third parties (including any Government Entity) concerning Coinbase’s Petition for Rulemaking or the Commission’s Order.</p>	<p><u>Request No. 29</u></p> <p>Without limitation as to time period, all Documents and Communications concerning the Petition for Rulemaking submitted by Coinbase on July 21, 2022, any comment letters submitted by Coinbase concerning its Petition for Rulemaking, or the Commission’s Order denying Coinbase’s Petition for Rulemaking issued on December 15, 2023, including any Communications with any third parties (including any Government Entity) concerning Coinbase’s Petition for Rulemaking or the Commission’s Order.</p>	
<p><u>Request No. 25</u></p> <p>All Documents and Communications concerning the comment letter sent to Coinbase Global, Inc. by the Commission dated September 22, 2023 regarding Coinbase Global, Inc.’s Form 10-K for the year ended December 31, 2022, Form 10-Q for the period ended June 30, 2023, Form 8-K filed January 10, 2023, and Form 8-K filed May 4, 2023 (File No. 001-40289) and any subsequent correspondence relating thereto.</p>	<p><u>Request No. 30</u></p> <p>Without limitation as to time period, all Documents and Communications concerning the comment letters sent to Coinbase Global, Inc. by the Commission dated September 22, 2023 and April 17, 2024 regarding Coinbase Global, Inc.’s Form 10-K for the year ended December 31, 2023, Form 10-K for the year ended December 31, 2022, Form 10-Q for the period ended June 30, 2023, Form 8-K filed January 10, 2023, and Form 8-K filed May 4, 2023 (File No. 001-40289), and any subsequent correspondence relating thereto.</p>	

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Defendants’ Subpoena to Mr. Gary Gensler, June 14 2024 (the “Subpoena”) (Ex. A)	Defendants’ Request for Production of Documents to SEC, April 23, 2024 (“RFPs”) (Ex. B)	Defendants’ Subpoena to MIT, June 4, 2023 (“MIT Subpoena”) (Ex. C)
<u>Request No. 26</u> All Documents and Communications concerning your purchase, use, ownership, or trading of Digital Assets or use of Digital Asset Platforms.		
<u>Request No. 27</u> All Documents and Communications concerning your courses “FinTech: Shaping the Financial World” and “Blockchain and Money,” including but not limited to syllabi, speaking notes, presentations, distributed materials, assignments, and any classroom recordings.		<u>Request No. 1</u> All Documents and Communications concerning Professor Gary Gensler’s courses “FinTech: Shaping the Financial World” and “Blockchain and Money,” including but not limited to syllabi, speaking notes, presentations, distributed materials (whether in person, through the Canvas system, or otherwise), assignments, and any classroom recordings.
<u>Request No. 28</u> All Documents and Communications concerning your work with the Massachusetts Institute of Technology’s Digital Currency Initiative, including any speeches, publications, or reports concerning Digital Assets, Digital Asset Platforms, Staking, or Staking as a Service.		<u>Request No. 2</u> All Documents and Communications concerning Professor Gary Gensler’s work with Your Digital Currency Initiative, including speeches, publications, and reports concerning Digital Assets, Digital Asset Platforms, Staking, or Staking as a Service.